

Receipt number AUSFCC-6235958

IN THE UNITED STATES COURT OF FEDERAL CLAIMS**PD LIQUIDATING TRUST, SUCCESSOR
IN INTEREST TO PAULA DOUGLASS****Plaintiff,****vs.****THE UNITED STATES,****Defendant.**§
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§**CIVIL ACTION** 20-704 L

**COMPLAINT FOR DOWNSTREAM PLAINTIFF
PD LIQUIDATING TRUST, SUCCESSOR IN INTEREST TO PAULA DOUGLASS**

By submitting this document, Plaintiff(s) adopts and incorporates by reference the Consolidated and Amended Downstream Master Complaint (ECF No. 23) filed in the above-styled Sub-Master Docket on January 16, 2018, and all subsequent amendments to that Complaint.

1. Name of Plaintiff(s): PD Liquidating Trust, successor in interest to Paula Douglass
2. Location by address of Plaintiff(s) property subject to Plaintiff(s) allegations of a Fifth Amendment taking without just compensation as a result of the Addicks/Barker reservoir releases:

- (i) 13 Tiel Way, Houston, Texas 77019

- (ii) _____

- (iii) _____

- a. Tax number for identified property:

- (i) 0601590560033

- (ii) _____

- (iii) _____

- b. Real property interest possessed by Plaintiff(s) alleged to have been taken
Ownership (*i.e.*, fee simple) X Leasehold _____ Other _____
- c. Manner of alleged taking of the property interest(s) listed in paragraph 2(b) above
Temporary _____ Permanent _____ Both X
3. Type of property alleged to have been taken:
Real Property _____ Personal Property _____ Both. X

Respectfully Submitted,

By: /s/ T. Micah Dortch

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